

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

KATHERINE JARVIS,

Plaintiff,

Case No: 2:21-cv-10381

v.

Hon. Bernard A. Friedman

OAKLAND-MACOMB OBSTETRICS AND GYNECOLOGY, P.C. AND
JOHN MICALLEF,

Defendants.

SHINN LEGAL, PLC
Jason M. Shinn (P64453)
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JACKSON LEWIS P.C.
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DEFENDANTS' RESPONSE TO SHINN LEGAL'S
MOTION TO WITHDRAW AS COUNSEL FOR
PLAINTIFF KATHERINE JARVIS

Defendants through their undersigned counsel, hereby state as follows in response to Shinn Legal's Motion to Withdraw as Counsel for Plaintiff Katherine Jarvis. Defendants have no objection to Shinn Legal's Motion to Withdraw and concur in Shinn Legal's request that this case be stayed for thirty days, or such other duration of time as the Court deems appropriate. In addition, Defendants would request that this Court set a deadline for Defendants to respond to or

otherwise move to strike Plaintiff's unilaterally filed Motion to Dismiss¹ and Withdraw for a date fourteen days after the stay is lifted.

WHEREFORE, Defendants respectfully request that in the event Shinn Legal's Motion to Withdraw is granted, that this matter be stayed until such time as Plaintiff finds new counsel or confirms that she will represent herself, and that the deadline for Defendants to respond to, or otherwise move to strike Plaintiff's unilaterally filed Motion to Dismiss and Withdraw be extended and set for fourteen days after the stay is lifted.

Respectfully submitted,
JACKSON LEWIS P.C.

By: /s/ Emily M. Petroski
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Dated: October 4, 2021

¹ Defendants note that Plaintiff's Motion was filed by Plaintiff without seeking concurrence from Defendants, in contravention of the requirements of Local Rule 7.1(a)(1), as well as Local Rule 83.25.

PROOF OF SERVICE

The undersigned hereby certifies that the foregoing instrument was served upon all parties in the above case at their respective addresses disclosed on the pleadings on October 4, 2021 by:

☐ Hand Delivery

☐ U. S. Mail

X ECF

☐ FAX

/s/ Emily M. Petroski